

From: Noelle Abastillas [mailto:noellea@greenlining.org] **On Behalf Of** Robert Gnaizda
Sent: Tuesday, April 19, 2005 12:17 PM
To: Comments
Subject: Re: RIN 3064-AC89

April 19, 2005

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington DC 20429
Re: RIN 3064-AC89
VIA EMAIL

Opposition and/or Concern Regarding CRA Changes

Dear Mr. Feldman,

Greenlining Institute is one of the nation's largest community reinvestment multiethnic coalitions and one of the two largest in California.

In general, we applaud you for resisting the OTS anti-consumer, "See No Evil" approach to CRA exams and reporting. However, we remain concerned about the nature of your analysis and disclosure regarding banks with between \$250 million to \$1 billion in assets.

One of our greatest concerns is the discretionary role of investments in communities. Investments, often far more than lending, are the key to revitalizing low-income communities.

Regarding the deletion of a separate test for services, we are concerned that this will reduce incentives for building bank branches in low-income communities, despite the fact that a growing number of multi-billion dollar banks have recognized the need for and profitability of bank branches in low-income communities.

Regarding the proposed elimination of public data disclosure requirements relating to community development and small business lending, we are perplexed as to why mid-size banks, which are vital in many communities, should be excluded from public data disclosure.

42 Letters of Concern and Opposition

Greenlining and its members formally request that this letter constitute 42 separate letters. Each of the organizations listed below would ordinarily send a similar letter, but in order not to burden the

regulators, we have done a joint letter. However, it should be counted as 42 separate letters.

Sincerely,



Robert Gnaizda
General Counsel
Greenlining Institute
1918 University Avenue, 2nd floor
Berkeley, CA 94704
(510) 926-4000 p
(510) 926-4010 f

On Behalf Of:

Allen Temple Baptist Church
American G.I. Forum
Antioch Baptist Church of San Jose
Asian Business Association
Asian Enterprise
Black Business Association
California Black Chamber of Commerce
California Hispanic Chamber of Commerce
California Journal for Filipino Americans
California Rural Legal Assistance
CHARO Community Development Corporation
Chicano Federation
El Concilio of San Mateo County
Filipino American Chamber L.A.
Filipino American Political Association
First A.M.E. Church, Los Angeles
Greater Phoenix Area Urban League
Hermandad Mexicana Latinoamericana
Hispanic Chamber of Commerce of Orange County
Hmong American Political Association
Japan Pacific Resources Network
La Maestra Family Clinic

Latin Business Association
Latino Issues Forum
Mabuhay Alliance
Mexican American Grocers Association
Mexican American Political Association
Minority Business Council
Mission Language and Vocational School
National Asian Pacific Publishers
National Black Business Council
National Council of Asian American Business Associations
National Federation of Filipino American Associations
Oakland Citizens Committee for Urban Renewal
San Francisco Black Chamber of Commerce
Search to Involve Pilipino Americans
Southeast Asian Community Center
TELACU
The Unity Council
Vietnamese Community of Orange County
West Angeles Church of God in Christ
West Coast Black Publishers Association